

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SAMSUNG ELECTRONICS CO., LTD.,	:	
	:	
Plaintiff,	:	
	:	
v.	:	C.A. No. 08-348 GMS
	:	
PETTERS GROUP WORLDWIDE, LLC,	:	
POLAROID CORPORATION, and	:	
WESTINGHOUSE DIGITAL	:	
ELECTRONICS, LLC,	:	
	:	
Defendants.	:	
	:	

**SECOND STIPULATED MOTION FOR EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD TO THE COMPLAINT
IN VIEW OF DIRECT AND ONGOING SETTLEMENT DISCUSSIONS**

Defendants Polaroid Corporation (“Polaroid”) and Petters Group Worldwide, LLC (“Petters”), hereby jointly¹ request that the Court grant a further extension of time for Polaroid and Petters to answer or otherwise plead to the Complaint. In support of this request, Polaroid and Petters note that the circumstances in this case have changed considerably since their first request for an extension of time. Additional settlement discussions have begun directly between Plaintiff, Samsung Electronics Co., Ltd (“Samsung”) and Polaroid and Petters, and have been taking place for a few weeks. Prior to that time, settlement discussions were only taking place between the patent licensing entity MPEG LA (see www.mpegla.com) and Polaroid and Petters. Within the present direct settlement discussions between Samsung and Polaroid and Petters, Samsung has promised to send over a draft settlement offer, which Polaroid and Petters have been waiting for since July 2, 2008. None has been received at present, but Samsung has represented that a settlement offer will be sent within days.

¹ Petters is the parent corporation of Polaroid.

Due to these new direct settlement negotiations and the upcoming deadline to answer or otherwise plead to the Complaint, counsel for Polaroid and Petters contacted counsel for Samsung and asked for an agreement to a second thirty day extension of time to answer or otherwise plead to the Complaint. Counsel for Samsung indicated that Samsung would not consent to a second thirty day extension, but would agree to an extension of time that would last until two weeks after the date that either party notifies the other that it is breaking off settlement talks. In light of the fact that the parties are now engaged in direct, good faith settlement negotiations, Polaroid and Petters believe that the grant of a second extension of time for Polaroid and Petters to answer or otherwise plead to the Complaint may facilitate a speedy resolution of this dispute.

Thus, Polaroid and Petters, with the consent of Samsung, request that the Court grant an extension of time for Polaroid and Petters to answer or otherwise plead to the Complaint until two weeks after the date one of the parties notifies the other that it is breaking off the ongoing settlement negotiations between them. In the alternative, Polaroid and Petters request that the Court grant a second thirty (30) day extension of time, until August 29, 2008, for Polaroid and Petters to answer or otherwise plead to the Complaint, in order to more fully explore settlement.

Respectfully submitted,

Dated: July 28, 2008

By: /s/ Daniel M. Silver
Michael P. Kelly (DE ID# 2295)
Andrew S. Dupre (DE ID# 4621)
Daniel M. Silver (DE ID# 4758)
McCarter & English, LLP
Renaissance Centre
405 N. King Street, 8th Floor
Wilmington, DE 19801
(302) 984-6300
dsilver@mccarter.com

Lee J. Eulgen (admitted pro hac vice)
James P. Muraff (admitted pro hac vice)
Gregory J. Leighton (admitted pro hac vice)
Neal, Gerber & Eisenberg LLP
2 North La Salle Street
Suite 2200
Chicago, Illinois 60602
(312)269-8000

Counsel for Polaroid Corporation and
Petters Group Worldwide, LLC

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PETTERS GROUP WORLDWIDE, LLC,	:	
POLAROID CORPORATION, and	:	
WESTINGHOUSE DIGITAL	:	
ELECTRONICS, LLC,	:	
	:	
Defendants.	:	
-----X		

[PROPOSED] ORDER

IT IS HEREBY ORDERED THIS _____ day of _____, 2008 that Defendants Petters Group Worldwide, LLC (“Petters”) and Polaroid Corporation (“Polaroid”) must file an Answer or otherwise respond to Samsung Electronics Co., Ltd.’s (“Samsung”) Complaint no later than fourteen (14) days after either Petters and Polaroid or Samsung notify each other that settlement discussions are being terminated.

CHIEF UNITED STATES DISTRICT JUDGE